

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

GILDA HAGAN-BROWN,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:14cv1614 (AJT/JFA)
)	
ELI LILLY AND COMPANY,)	
)	
Defendant.)	
_____)	

MOTION TO EXTEND TIME FOR DOCUMENT PRODUCTION

For the reasons set forth in the Memorandum accompanying this Motion, which Memorandum is incorporated by reference, Defendant Eli Lilly and Company respectfully moves this Court for an extension of time, pursuant to Local Civil Rule 37, in which to produce certain discovery materials. Defendant waives a hearing on this Motion.

Respectfully submitted,

/s/ Jeffrey T. Bozman
Jeffrey Todd Bozman (VA 83679)
Covington & Burling LLP
One CityCenter
850 Tenth Street, NW
Washington, DC 20001
Tel: (202) 662-5829
Fax: (202) 778-5829
jbozman@cov.com
Counsel for Eli Lilly and Company

CERTIFICATE OF SERVICE

I hereby certify that on April 14, 2015, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Peter A. Miller
Brielle Marie Hunt
Miller Legal LLC
175 S. Pantops Drive, Third Floor
Charlottesville, VA 22911
Tel: (434) 529-6909
Fax: (888) 830-1488
Email: PMiller@MillerLegalLLC.com
bhunt@millerlegalllc.com

R. Brent Wisner, Esq. (*pro hac vice*)
BAUM, HEDLUND, ARISTEI & GOLDMAN, P.C.
12100 Wilshire Blvd., Suite 950
Los Angeles, CA 90025
Tel: (310) 207-3233
Fax: (310) 820-7444
Email: rbwisner@baumhedlundlaw.com

Counsel for Gilda Hagan-Brown

/s/
Jeffrey Todd Bozman (VA 83679)
Covington & Burling LLP
One CityCenter
850 Tenth Street, NW
Washington, DC 20001
Tel: (202) 662-5829
Fax: (202) 778-5829
jbozman@cov.com
Counsel for Eli Lilly and Company